

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET
FOR THE PERIOD MAY 1 TO MAY 31, 2023

Debtor: LTL Management LLC

Applicant: **Blake, Cassels & Graydon LLP**

Case No.: 23-12825-MBK

Client: LTL Management LLC (“LTL”)

Chapter: 11

Case Filed: April 4, 2023 (the “Petition Date”)

SECTION 1
FEE SUMMARY

☐ Interim Fee Application No. _____ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from May 1 to 31, 2023 (the “Second Statement Period”).

	CAD
Total Fees:	\$60,881.30
Total Disbursements:	\$0.00
Total Fees and Disbursements:	\$60,881.30
Minus 20% Holdback of Fees:	(\$12,176.26)
Amount Sought at this Time:	\$48,705.04

	<u>FEES</u>	<u>EXPENSES</u>
Total Previously Requested:	\$150,013.40	\$1,260.00
Total Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable) ¹ :		
Total Holdback (If Applicable):	(\$30,002.68)	\$0.00
Total Received by Applicant:	\$0.00	\$0.00

¹ Reconciliation of the Pre-Filing and Post-Filing Amounts received from LTL will be provided in Blakes’ First Interim Fee Application.

Name of Professional & Title	Year Admitted	Hours	Rate (CAD)	Fees (CAD)
Gordon McKee Partner, Litigation & Dispute Resolution (Toronto)	1988	7.8	\$1,070.00	\$8,346.00
Linc Rogers Partner, Restructuring & Insolvency (Toronto)	2000	19.6	\$913.00	\$17,894.80
Karine Russell Partner, Litigation & Dispute Resolution (Vancouver)	2009	.9	\$675.00	\$607.50
Caitlin McIntyre Associate, Restructuring & Insolvency (Toronto)	2017	25.8	\$664.00	\$17,131.20
Alexia Parente Associate, Restructuring & Insolvency (Toronto)	2021	12.0	\$537.00	\$6,444.00
Nancy Thompson Law Clerk, Restructuring & Insolvency (Toronto)	N/A	27.6	\$378.00	\$10,432.80
Carlo Amoroso Filing Clerk (Toronto)	N/A	N/A	<i>Flat Rate</i>	\$25.00

Blended Hourly Rate: [Excluding Nancy Thompson and Filing Clerks]				\$763.21
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**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEES (CAD)
1. Litigation Consulting: CCAA Recognition Proceeding Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	61.6	\$45,210.70
2. Fee and Retention Application Preparation of employment and fee applications for self or others; motions to establish interim procedures	32.1	\$15,670.60
3. Litigation: Canadian Actions Other than Avoidance Action Litigation		
8. Litigation: General / All Class Actions Other than Avoidance Action Litigation		
SERVICE TOTALS:	93.2	\$60,881.30

Note: Fees for No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1

**SECTION III
SUMMARY OF DISBURSEMENTS**

Matter No.	DISBURSEMENTS	AMOUNT (CAD)
	N/A	
	DISBURSEMENTS TOTALS	

Note: Disbursements for matter No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1

**SECTION IV
CASE HISTORY**

1. Date of Retention: June 15, 2023, effective as of the Petition Date [Dkt. 791] (the “Retention Order”).²
2. Summary explaining the nature of the work performed and the results achieved:
 - Monitoring the 2023 Chapter 11 proceeding, including virtual attendance on May 3, 16 and 30, and considering impact on the CCAA recognition proceeding;
 - Finalizing the requested order, and preparing for and attending hearing in the Ontario Court in connection with the recognition of the US preliminary injunction order;
 - Communication with the Information Officer appointed by the Ontario Court regarding its correspondence to Canadian courts to ensure it correctly reflects the status of the proceeding and the position of the Foreign Representative;
 - Providing comments on draft plan and disclosure statement in US Chapter 11 proceeding to ensure it accurately reflects the Canadian proceeding;
 - Providing comments on correspondence to plaintiff counsel regarding talc-related matters;
 - Preparing client disclosure schedule required for Blakes’ retention application;
 - Preparing Blakes’ retention application; and
 - Preparing supplemental certification and responses to issues and questions raised by the US Trustee.

I certify under penalty of perjury that the above is true.

Date: July 24, 2023

/s/ Linc Rogers

Linc Rogers

Blake, Cassels & Graydon LLP

² The Retention Order is attached hereto as Exhibit A.